## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA **Alexandria Division**

:

CESAR ALFARO,

Plaintiff,

C.A. No. 1:15-cv-599-GBL-JFA v. :

:

LEXISNEXIS RISK ANALYTICS SOLUTIONS, INC., et al.

**Defendants.** 

## CONSENT MOTION TO ENTER STIPULATED PROTECTIVE ORDER AND APPROVED CONFIDENTIALITY AGREEMENT

The parties Cesar Alfaro ("Plaintiff") and Defendant LexisNexis Risk Data Retrieval Services LLC ("LNRDRS") (collectively "Parties") through their respective attorneys of record, jointly submit this Consent Motion to Enter Stipulated Protective Order and Approved Confidentiality Agreement.

WHEREFORE, the parties ask that the Court grant this Motion. A proposed Stipulated Protective Order and Approved Confidentiality Agreement is attached.

Respectfully submitted, Dated: August 27, 2015

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and

 $/s/_$ 

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Counsel for Plaintiff, CESAR ALFARO

## **CERTIFICATE OF SERVICE**

I certify that on this 27<sup>th</sup> day of August, 2015, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record.

s/

Bernard J. DiMuro, Esquire VSB # 18784 Counsel for Defendant LEXISNEXIS RISK DATA RETRIEVAL SERVICES LLC

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